

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

RYSTA LEONA SUSMAN, Both )  
Individually and as Legal Guardian of )  
Shane Allen Loveland; and JACOB )  
SUMMERS )  
Plaintiff(s), ) **8:18CV127**  
)  
v. ) **PLAINTIFFS' AMENDED EXPERT**  
THE GOODYEAR TIRE & RUBBER ) **WITNESS DISCLOSURE**  
COMPANY )  
Defendant(s). )

Plaintiffs by and through their attorneys, and in accordance with this Court's October 10, 2018 order disclose the following Expert Witnesses that may be called at the trial of this matter.

**A. Expert Witnesses**

1. David Southwell  
27 Netherby Avenue  
Netherby, South Australia 5062

Mr. Southwell is an expert in Tire Failure Analysis. Mr. Southwell is expected to testify regarding the cause of failure of the subject tire, the defective design and manufacture of the subject tire, safer alternative designs that were technologically feasible when the subject tire was designed and manufactured as well as other similar incidents of similar tire failures. Mr. Southwell's opinions are provided in full in his attached expert report.

2. Micky Gilbert  
Gilbert Engineering, LLC  
16254 W. 77<sup>th</sup> Lane  
Arvada, Colorado 80007

Mr. Gilbert is an expert in Accident Reconstruction and vehicle handling. He is expected to testify as to the reconstruction of the subject accident of May 1, 2015 and the handling of the subject vehicle including the effect of a rear tire detread as occurred in the subject accident resulting in a loss of control. Mr. Gilbert's opinions are provided in full in his attached expert report.

3. Craig Lichtblau, M.D.  
Physical Medicine and Rehabilitation Board Certification  
550 Northlake Boulevard  
North Palm Beach, Florida 33408

Dr. Lichtblau is an expert in the area of continuing care for individuals who have been severely impaired and disabled. Dr. Lichtblau is expected to testify regarding Mr. Loveland's injuries that resulted from the May 1, 2015 subject accident as well as the necessary past and future care needed due to the injuries sustained from the May 1, 2015 subject accident. Dr. Lichtblau's opinions are provided in full in his attached expert report.

4. Bernard F. Pettingill, Ph.D  
93 Sandborne Lane, PGA National  
Palm Beach Gardens, Florida 33418

Dr. Pettingill is a forensic economist. He will testify regarding the loss of income, both past and future, experienced by Mr. Loveland as well as the cost associated with Mr. Loveland's present and future care that is needed due to the injuries sustained from the May 1, 2015 subject accident. Dr. Pettingill's opinions are provided in full in his attached expert report.

5. Lila Laux, PhD  
Human Factors Consulting  
417 Leyden St.  
Denver, CO 80220

Dr. Laux is an expert in human factors analysis. She is expected to testify regarding the information and warnings that accompanied or should have accompanied the subject tire. Dr. Laux's opinions are provided in full in her attached expert report.

## **B. Medical Providers**

Plaintiffs' may call the following medical providers to testify regarding the injuries and treatment sustained by the Plaintiffs' as a result of the May 1, 2015 subject accident.

6. CHI Health Good Samaritan  
Dr. Richard S. Jerde  
Dr. William T. Sorrell  
10 E 31<sup>st</sup> St.  
Kearney, NE 68847  
Medical provider for Shane Loveland
7. Madonna Rehabilitation Hospital  
Dr. Morgan T. LaHolt  
5401 South St.

Lincoln, NE 68506  
Medical provider for Shane Loveland

8. Colorado Blood and Cancer Care  
Dr. Raul Alvarez  
701 E. Hampden Ave, Ste 532  
Englewood, CO 80113  
Medical Provider for Shane Loveland
9. Learning Services Neurobehavioral Institute  
Dr. Jill Castro  
Melissa Abate, LMSW, CCM  
7201 W Hampden Ave  
Lakewood, CO 80227  
Medical provider for Shane Loveland
10. Swedish Medical Center  
Dr. Emily S. Marsh  
Dr. Brett Bartz  
501 E. Hampden Ave  
Englewood, CO 80113  
Medical provider for Shane Loveland
11. Panorama Orthopedics & Spine Center  
Dr. Michael B. Ellman  
1060 Plaza Dr., Ste. 200  
Littleton, CO 80129  
Medical Provider for Shane Loveland
12. Kearney Clinic, PC  
Dr. Chadd S. Murray  
211 W. 33<sup>rd</sup> Street  
Kearney, NE 68845  
Medical Provider for Shane Loveland
13. Kearney Regional Medical Centre  
Dr. Robert Crandall  
Dr. Scott Smith  
PO Box 3186  
Omaha, NE 68103  
Medical provider for Jacob Summers
14. Madonna Rehabilitation Hospital  
Dr. Daniel B. Einsphar  
5401 South Street  
Lincoln, NE 68506

Medical provider for Jacob Summers

15. University of Nebraska Medical Center  
Dr. Lawrence E. Nelson  
Dr. Daniel Anderson  
10304 Crown Point Ave  
Omaha, NE 68134  
Medical Provider for Jacob Summers
  
16. New West Sports Medicine and Orthopaedic  
Dr. James M. Mehalek  
2810 West 35<sup>th</sup> St, Ste 1  
Kearney, NE 68845  
Medical provider for Jacob Summers

Respectfully submitted,

**KASTER, LYNCH, FARRAR, & BALL, L.L.P.**

By:



---

Kyle Wayne Farrar (*Pro Hac Vice*)  
Texas Bar No. 24038754  
1010 Lamar, Suite 1600  
Houston, TX 77002  
(713) 221-8300 (Telephone)  
(713) 221-8301 (Facsimile)  
[kyle@fbtrial.com](mailto:kyle@fbtrial.com)

and

Paul Godlewski (*Pro Hac Vice*)  
SCHEWEBEL, GOETZ & SIEBEN, P.A.  
5120 IDS Center  
80 S. 8<sup>th</sup> Street, #5120  
Minneapolis, Minnesota 55402  
612.377.7777  
612.333.6311 (Fax)  
[pgodlewski@schwebel.com](mailto:pgodlewski@schwebel.com)

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on March 14, 2019. I forwarded a copy of the foregoing to the following:

Edward S. Bott, Jr.  
GREENSFELDER, HEMKER & GALE, P.C.  
10 South Broadway, Suite 2000  
St. Louis, Mo. 63102  
314.516.2690  
314.241.4245 (Fax)  
[esb@greensfelder.com](mailto:esb@greensfelder.com)

*and*

Jennifer D. Tricker  
BAIRD HOLM, LLP  
1700 Farnam Street, Suite 1500  
Omaha, Nebraska 68102  
402.344.0500  
402.344.0588 (Fax)  
[jtricker@bairdholm.com](mailto:jtricker@bairdholm.com)

*Attorneys for Defendant, The Goodyear Tire & Rubber Company*



Kyle W. Farrar